

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LIGADO NETWORKS LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10006 (TMH)

(Jointly Administered)

**THE DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR
SEPTEMBER 3, 2025 AT 3:00 P.M. (PREVAILING EASTERN TIME)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) respectfully file this witness and exhibit list (the “Witness and Exhibit List”) identifying the individual(s) that the Debtors may call as witnesses and the exhibits the Debtors may introduce as evidence at the hearing to be held on September 3, 2025 at 3:00 p.m. (ET) (the “Hearing”) before the Honorable Thomas M. Horan, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

The Debtors reserve the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing, to call any witness on any other party's witness list (regardless of whether that party removes that witness from its list), to call any witness necessary to authenticate documents (to the extent necessary), and to call any witness to provide rebuttal or impeachment testimony (as appropriate). The Debtors further reserve the right to ask the Court to take judicial notice of pleadings, transcripts, and/or documents filed in or in connection with the above-

1 The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors' headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

captioned cases, to offer rebuttal exhibits, and to modify, supplement, or amend this Witness and Exhibit List at any time prior to or during the Hearing. Designation of any exhibit below does not waive any objections the Debtors may have to any exhibit listed on any party's exhibit list or introduced at the Hearing.

WITNESSES

The Debtors may present the testimony of the following witnesses, by declaration, direct testimony or otherwise, at the Hearing:

- A. Douglas Smith, Chief Executive Office of Ligado Networks LLC. The Debtors intend to rely on the following declaration submitted by Mr. Smith for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Smith at the Hearing:

a. *Declaration of Douglas Smith in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession*

- B. Bruce Mendelsohn, a Partner at the Global Head of the Financing and Capital Solutions Group at Perella Weinberg Partners L.P. The Debtors intend to rely on the following declaration submitted by Mr. Mendelsohn for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Mendelsohn at the Hearing:

a. *Declaration of Bruce Mendelsohn in Support of Debtors' Motion for Entry of an Order (I) Approving the Amendment to the DIP Credit Agreement, (II) Approving the Letter Agreement and AST Power of Attorney, and (III) Granting Related Relief*

C. Jeriad R. Paul, Vice President of Omni Agent Solutions Inc. The Debtors intend to rely on the following declaration submitted by Mr. Paul for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Paul at the Hearing:

- a. *Declaration of Jeriad R. Paul Regarding the Solicitation and Tabulation of Votes On, and Elections to Opt Out of the Third Party Release Contained in, the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, and all exhibits attached thereto*

D. Michael Healy, a Senior Managing Director at FTI Consulting, Inc. The Debtors intend to rely on the following declaration submitted by Mr. Healy for direct testimony, but reserve the right to supplement such declaration through direct live testimony of Mr. Healy at the Hearing:

- a. *Declaration of Michael Healy in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession*

The Debtors may call any witness listed or called by any other party and any rebuttal or impeachment witnesses.

EXHIBITS

Ex. No.	Description	Docket No. (if available)
1.	[SEALED] <i>Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i>	352
2.	[REDACTED] <i>Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i>	359
3.	<i>Notice of Filing of Blackline of Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the</i>	360

	<i>AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i>	
4.	<i>Notice of Filing of Amendment to Exhibit to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the AST Definitive Documents and (II) Granting Related Relief</i>	559
5.	<i>Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i>	348
6.	<i>Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	349
7.	<i>Motion of Debtors for Entry of Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation, and (V) Granting Related Relief, including all exhibits attached thereto</i>	350
8.	<i>Notice of Filing of Exhibits C and D (Projections and Liquidation Analysis) to the Disclosure Statement for Joint Chapter 11 Plan of Reorganization of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	424
9.	<i>Objection of the United States Trustee to Approval of Disclosure Statement</i>	463
10.	<i>Debtors' Reply to the U.S. Trustee's Objection to the Disclosure Statement Motion and in Further Support Thereof, including all exhibits attached thereto</i>	560
11.	<i>Notice of Filing Revised Order (I) Authorizing the Debtors to Enter into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i>	651
12.	<i>Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i>	652
13.	<i>Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	653
14.	<i>Notice of Filing of Blackline of Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	654
15.	<i>Notice of Filing of Blackline of Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its</i>	655

	<i>Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	
16.	<i>Notice of Filing of Revised Order (I) Approving Proposed Disclosure Statement and Form and Manner of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation, and (V) Granting Related Relief, including all exhibits attached thereto</i>	656
17.	<i>Order (I) Authorizing the Debtors to Enter Into the AST Definitive Documents and (II) Granting Related Relief, including all exhibits attached thereto</i>	692
18.	<i>Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief, including all exhibits attached thereto</i>	694
19.	<i>Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	696
20.	<i>Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	697
21.	<i>Notice of Blacklines of (I) Joint Chapter 11 Plan of Ligado Networks and Its Affiliated Debtors and Debtors in Possession and (II) Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	701
22.	<i>Objection of the United States Trustee to Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, including all exhibits attached thereto</i>	760
23.	<i>Objection by the United States of America to the Debtors' Joint Chapter 11 Plan of Ligado Networks, LLC</i>	762
24.	<i>Debtors' Motion for Entry of an Order (I) Approving the Amendment to the DIP Credit Agreement, (II) Approving the Letter Agreement and AST Power of Attorney, and (III) Granting Related Relief, including all exhibits attached thereto</i>	764

25.	<i>Declaration of Bruce Mendelsohn in Support of Debtors' Motion for Entry of an Order (I) Approving the Amendment to the DIP Credit Agreement, (II) Approving the Letter Agreement and AST Power of Attorney, and (III) Granting Related Relief</i>	764-3
26.	<i>Declaration of Michael Healy in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i>	<i>To be filed.</i>
27.	<i>Declaration of Jeriad R. Paul Regarding the Solicitation and Tabulation of Votes On, and Elections to Opt Out of the Third Party Release Contained in, the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession, and all exhibits attached thereto</i>	<i>To be filed.</i>
28.	<i>Declaration of Douglas Smith in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i>	<i>To be filed.</i>
29.	<i>Debtors' Memorandum of Law in Support of Confirmation of the Joint Chapter 11 Plan of Ligado Networks LLC and Its Affiliated Debtors and Debtors in Possession</i>	<i>To be filed.</i>
30.	<i>Notice of Filing of Proposed Confirmation Order</i>	<i>To be filed.</i>
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases or related adversary proceedings	
	Any exhibit necessary to rebut the evidence of testimony of any witness offered or designated by any other party	
	Any exhibit listed by any other party	

Dated: August 28, 2025
Wilmington, Delaware

/s/ Michael J. Merchant

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